

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

AMERICAN CIVIL LIBERTIES)
UNION OF MASSACHUSETTS, INC.,)
)
Plaintiff,)
)
vs.)
)
THE CENTRAL INTELLIGENCE)
AGENCY, <i>et al.</i>,)
)
Defendants.)
)
)

Civil Action No. 1:22-cv-11532

NOTICE OF COMPLIANCE

Defendants the Central Intelligence Agency (“CIA”), the Office of the Director of National Intelligence (“ODNI”), the United States Department of Defense (“DoD”), and the National Security Agency (“NSA”) (collectively, “Defendants”) hereby provide notice of their compliance with the Court’s Orders of May 11, 2023, and May 22, 2023, *see* ECF Nos. 33 and 36. Specifically, on June 23, 2023, Defendants provided the attached letter to Plaintiff’s counsel supplementing Defendants’ responses to Plaintiff’s Freedom of Information Act request.

Dated: June 23, 2023

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

ELIZABETH J. SHAPIRO
Deputy Director
Federal Programs Branch

/s/ Julia A. Heiman
JULIA A. HEIMAN (D.C. Bar No. 986228)
Senior Counsel

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CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system and will therefore be sent electronically to Plaintiff's counsel identified on the Notice of Electric Filing (NEF).

/s/ Julia A. Heiman
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June 23, 2023

Via Email

Daniel McFadden
Staff Attorney
ACLU of Massachusetts
One Center Plaza, Suite 850
Boston, MA 02108

Re: *Am. Civil Liberties Union of Mass., Inc. v. Central Intelligence Agency, et al.*,
Civil Action No. 22-cv-11532

Dear Mr. McFadden:

Pursuant to the Court's orders of May 11, 2023, and May 22, 2023, *see* ECF Nos. 33 and 36, I am writing to convey Defendants' supplemental responses to your Freedom of Information Act request of August 15, 2022. Each of the Defendants¹, respectively, supplements its response as follows: the agency possesses no records responsive to your request.

Best regards,

/s/ Julia A. Heiman

JULIA A. HEIMAN
Senior Counsel

United States Department of Justice
Civil Division, Federal Programs Branch

¹ Defendants are the Central Intelligence Agency, the Office of the Director of National Intelligence, the United States Department of Defense, and the National Security Agency.